IN THE KING COUNTY DISTRICT COURT- SEATTLE COURTHOUSE
STATE OF WASHINGTON

TIFFANY KO, **Petitioner,** **VS.** CHRISTOPHER LEE, **Respondent.**	**No.** 205-00744 **DECLARATION OF TIFFANY KO**

I, TIFFANY KO, declare the following:

Christopher Lee has been threatening me, cyber-stalking me, and harassing me for the last three years. His actions have caused me to fear for my safety, the safety of my family and friends, and to fear for my professional employment security. In 2017, I repeatedly asked him to stop contacting me, which he refused to do and sent me hundreds of unwanted and threatening messages. I stopped contacting Mr. Lee in May of 2017. Since that time, he has attempted to smear my name and reputation by reaching out to my boyfriend, family, friends, and colleagues and posting fictitious defamatory and sexually explicit photographs and information about me on

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social media and the internet. Most recently, in March of 2020, he sent two letters to my home address that among other things threatened my boyfriend, Jasper Lin.

I met Christopher Lee in 2008 as a high school classmate. We remained classmates through 2010 and during that time we were friendly with one another. After high school concluded, we drifted apart and did not have any contact between 2011-July of 2013.

In July of 2013, we reconnected and eventually agreed to meet up. We had sexual intercourse one time. During our night together, I allowed Chris to take sexually explicit photographs of me, which I now deeply regret. I never had access to those photographs and Chris is the only person who ever had access to those photographs.

Shortly thereafter, Chris began to exhibit concerning behavior, such as being very possessive and controlling of me. He started acting very needy and had convinced himself that our one night together meant we were moving towards being together, which was not the case. I thought his actions were a red-flag, and I informed him that I did not desire to have any further contact with him.

Between 2013-2017, I did not have any contact with Chris. I moved on with my life and assumed he had done the same.

In March of 2017, Chris contacted me out of the blue from the telephone number, 510-565-8117, which I knew to be his number because a friend confirmed Chris had contacted her from that number as well. Chris wanted me to know that he still loved me and that I needed to apologize to him for leaving him. I was surprised to hear from Chris and equally shocked to discover that he still harbored ill-will for me after four years. Initially, I was willing to interact

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with Chris to help him get closure. However, Chris' behavior quickly escalated into a frightening territory as he started sending me hundreds of text messages in a row and leaving numerous voicemails in a row.

On March 28, 2017, I agreed to meet with Chris because I hoped that meeting with him would allow him to say what he needed to say and eliminate any need for further contact. When I arrived to meet Chris, he handed me a nearly twenty-page document he wrote which he called a "Confessions Contract" that he demanded I recite and sign while he filmed me. I reviewed the document and discovered that each clause contained something he alleged I had done that caused him pain. Although I did not agree with anything contained in the contract, I decided to accede to his demands because I hoped it would put an end to any future contact between us. I was also worried about what he would do if I refused to sign the document, so I signed and hoped it provided him with the closure he needed. Unfortunately, signing the "contract" did not have the intended effect as Chris continued to contact me incessantly and in an increasingly manipulative and threatening way.

Beginning on March 8, 2017, and continuing through May of 2017, Chris sent me nearly a thousand text messages, ranging from delusional to outright threatening. I have attached as Exhibit A just a portion of the messages he sent to me during that time. Below I have transcribed some of the numerous threats and statements Chris texted me from numerous numbers:

- March 8, 2017- "You should allow me to have closure, because if you don't, there might be a problem."

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- March 9, 2017- “What the fuck was I supposed to think about the girl I saw in these videos? Do these reactions look like you “never loved” me? Fuck yourself.”
- March 26, 2017- “I feel like I am about to go after you you fucking cunt,” “God I hate you I hate you make it stop you fucking piece of shit,” “You’re just happily sleeping with your bf right now while I waste away in agonizing pain.”
- March 26, 2017- “I curse you to hell,” “Why do you have to be such a fucking slut,” “Why couldn’t you just be decent and proper and be a good girl so I wouldn’t have to be so fucked up about how you turned naughty and messed up towards guys.”
- March 26, 2017- “I will haunt you every fucking day when I die,” “You will never understand what it means to be afraid to be alive,” “BEFORE I GO I WILL MAKE SURE THE HEAVENS WILL BRING DAMNATION ON YOUR FUCKKBG SOUL.”
- March 26, 2017- “Keep ignoring my texts you fucking piece of shit while my brain sets on fire and it burns me to hell you piece of shit,” “Whenever I think about you having sex with a bunch of random guys.”
- March 31, 2017- “Do you think I am fucking around you fucking cunt.”
- April 1, 2017- “You disgusting, sick person. You will experience divine retribution. God will make you atone.”
- April 1, 2017- “Everytime some fucked up thing happens to you, you will remember me,” “MAY YOU ALWAYS LIVE IN FEAR OF RETRIBUTION.”

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- April 1, 2017- “Fuk you too bitch.”
- April 1, 2017- “I will do whatever it takes to settle this conclusively... I will pray for God to bring you, Tiffany Ko, misfortune and disaster... You, Tiffany Ko, will be cursed by me every day, every moment, until I die... I will go to you and you, Tiffany Ko, will see my hollow eyes stare at you every day, waiting for you to atone for your sins.”
- April 22, 2017- “I am having thoughts of killing myself. The pain is too much.”
- April 23, 2017- “God will make you atone,” “How many men have you betrayed I wonder. I can’t imagine how Jonathan felt when you betrayed him. That’s why you turned him into a murderer.”
- April 23, 2017- “My friends know about you now... your actions of illicit and sexually irresponsible behavior” “I have video evidence of you now. I hope you won’t do anything stupid,” “you’re a scared cunt,” “I hope Jasper Lin will find out who you really are.”
- May 4, 2017- “Kill yourself, Tiffany.”
- May 12, 2017- “I know you only agreed to reconcile because you were afraid of what I was going to do to you. I will get you, Tiffany. I warned you and you thought you could just do what you did before and run away. You won’t be able to.” “It’s to atone for the previous emotional and sexual abuse you put me through.”

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- May 12, 2017- “I definitely won’t allow you to get away from it. You underestimated what I am capable of. I promised you that if you didn’t resolve me properly, we would have a very big problem between us. I will make sure you pay for what you did.” “You have had sex with too many men to the point where you are desensitized to love and romance and you are confused as to your own role as a lover and other men in your life,” “You are a whore.”
- May 12, 2017- “Your behavior is the sign of a criminal,” “I have cursed you,” “No, you will not escape from what you did to me,” “Your sins will be cleansed while you burn in hell. My grudge will follow you to your death.”
- May 12, 2017- “I will detail a possibility of entertaining a lawsuit against you below. You should prepare yourself, because you will pay dearly for what you did to me... You know you are not good enough to be some hot diva, so you want to be competed for by multiple men.”

The majority of these messages came from the same telephone number, 510-565-8117, Chris had used when previously communicating with me. However, he also messaged me from numerous other numbers such as 718-475-9889, 510-731-6775, 510-556-4945, 415-549-3667, and 510-328-6112. I know these numbers were him as well because he mentioned many of the same things as he did in his other text messages, I received these harassing texts during the same time period in 2017, and he did not deny it when I called him Chris in my responsive messages. Moreover, Chris previously told me that he knew how to “spoof” telephone numbers, which allowed him to disguise his number or make it appear as if the texts were coming from a

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different phone number. He even admitted to me via text that he had "prank" called me before pretending to be an acquaintance of mine. Chris said, "Your phone randomly ringing and calling people? That was actually me. I just prank dialed you. See Exhibit B.

On March 8, 2017, Chris admitted to me via text message that he kept the sexually explicit photos he took of me in Las Vegas from 2013. He told me, "I kept your photos/videos to myself by the way. I never did anything with them, because I wouldn't be the type of person to use them against you. But you would easily deserve it." See Exhibit C.

By May of 2017, I realized there was nothing I could do or say to get Chris to stop messaging and harassing me. I finally told him numerous times to stop contacting me and blocked all his numbers and blocked him on all forms of social media. This was the last time I had direct communication with Chris. Shortly after I blocked Chris, he continued to try to contact me indirectly through my friend Audrey Wu and my current boyfriend Jasper Lin.

From June of 2017-2018, I had no contact with Chris. I was hopeful that Chris had moved on and was not going to follow through on any of his threatening statements.

However, from November 2018-January 2019, I was notified that multiple fake accounts had been created on various social media platforms that were designed to defame me and ruin my reputation. The accounts claimed that I had been "reported for conspiracy to murder," "suffer from manic depression," "reported for substance abuse and fraud," "reported for physically abusing several of her co-workers," and "in legal litigation involving her harassment of others." I immediately knew that Chris was behind these postings. Not only had he used some of the same language and word choice that he used back in his messages from 2017, but he was also making

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the same false allegations, specifically that I was part of a murder conspiracy in high school.

Over the last 18 months, Chris has implemented an organized and systemic pattern of social media defamation against me. In March of 2020, Chris created a fake twerking business for me and posted the same sexually explicit photos he took in 2013 on a website he created, which included my personal information such as my address. Chris impersonated me on various social media websites and posted the same sexual photos only he has access to, posted my personal information, and linked these websites to my actual social media accounts used for work. Chris posted articles under pseudonyms trying to expose the "real" me and making the same false allegations that I was involved in "conspiracy to murder" in high school. The common thread throughout all of the fake accounts and websites created by Chris is that he repeatedly mentions me having sex with lots of men, just as he did in his text messages in 2017, repeatedly references a conspiracy to commit murder plot, and repeatedly references and uses the names of my high school boyfriends, Jonathan and Garrett. Chris is one of few people who has access to this information because he went to high school with me and is the only person who has ever sent me threatening messages that references all this information. Additionally, Chris' Yelp business page has been reviewed for suspicious activity, specifically "reviews originated from the same IP address or from users we've identified as possible participants in a deceptive review ring," another example of Chris' attempt to disguise his online activities under the guise of other people. See Exhibit D.

On June 8, 2019, I received a physical copy of a cease and desist letter in my office mailbox alleging to be from attorney Robert J. Bird from New York state on behalf of his client,

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Jay Hung, whom I do not know and have never met. Once again, this letter references a murder plot involving my ex-boyfriend Jonathan and a lockdown in Alameda County, which is the exact same references Chris made to me previously during his text messages in 2017. The letter also references me having "over a hundred sexual partners," another false allegation that Chris has obsessed over for years. See Exhibit E.

I had my attorney review the letter, and it is his belief the letter is a fake and was not drafted by an attorney. He believes the letter is fraudulent based on the faulty information contained in the letter because 1) it does not provide a contact number for the attorney, 2) it includes a New York attorney threatening prosecution in the state of California, 3) he attempted to contact the attorney listed on the letter, and he found no evidence of an attorney named Robert J. Bird practicing law in New York at the address listed on the letter, 4) several employees at my company have received a link via LinkedIn message to the same "Cease and Desist" document, and 5) it appears to be a standard template cease-and-desist letter that is often found on the internet. Based on the thousands of messages I have received from Chris over the years, I am positive that Chris was the person who created this letter and sent it to me.

In March of 2020, my boyfriend, friends, family, and fellow residents in my apartment received a letter purporting to be from an FBI investigator in the Criminal Investigation Unit in New York named James Green. As I'm sure Chris intended, I was contacted by everyone to whom he sent the letter because they were concerned about whoever was spreading these false allegations about me. I believe Chris knows he would get in more trouble if he contacted me directly, so he is attempting to harass me by sending documents to third-parties that he knows

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will contact me and pass along what they received. The letter also references the "murder conspiracy" from high school and once again names both of my ex-boyfriends' names as well as making reference me to having sexual intercourse with lots of men.

My attorney called the number provided in the letter and told me it was not answered, and he received an automated message saying the text now subscriber was not available. My attorney believes this letter is also fraudulent because of the information contained therein, the formatting of the letter, and that it was sent to my friends, family, and neighbors. Moreover, even though the letter claims to be sent from an FBI investigator from New York, it is post-marked from Oakland, CA, where Christopher Lee lives and was served with the protection order. See Exhibit F.

In March of 2020, in addition to the letter from the FBI Investigator, I received another letter purportedly from Jonathan Tran, which is the name of my ex-boyfriend from high school. See Exhibit G. The letter is drafted in the same format as the FBI letter allegedly written by James Green. The letter contains a series of veiled threats to my boyfriend, Jasper Lin, such as:

- "The events are set in motion, and it is outside of our control now."
- "Tiffany Ko is now blacklisted"
- "Even if I am gone, there are more than enough people to take my place, and carry this on against her."
- "There will be consequences for everyone"
- "Carefully consider your future, and read carefully."
- "Tiffany Ko is a used whore."

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- But, Tiffany Ko has done terrible things to us, of which she will atone for, the rest of her life."
- "If it helps, we can reveal two of the identity of two another fuck buddies that she kept cheating on you with."
- "I believe in giving you a shot at this, Jasper, so you have NOT been blacklisted."

The letters contain the similar theme of me being sexually promiscuous, me being a fraud, a dangerous criminal, and use the same language of me needing to "atone" as Chris' previous text messages. There is no doubt in my mind that this was sent by Chris and not sent by Jonathan Tran, who harbors no ill-will against me.

I am very concerned for my safety once again because Chris' behavior is starting to escalate once again. He has moved past posting on social media websites and is now not only sending defamatory documents to my work and family, but he is also sending messages directly to me at my home address. I have already reported everything to police departments in California and Seattle, the latter of which strongly recommended that I petition the court for a protection order. I was recently contacted by a Victim Advocate from the City of Seattle attorney's office to discuss my police report. I was informed that Chris is being investigated for cyberstalking and disclosure of intimate images, and the prosecutor is currently reviewing the case.

I am asking that the court grant me a permanent anti-harassment protection order against Chris because I don't believe he will ever stop attempting to contact me. Chris has been threatening me for many years and has been able to do so without any repercussions up to this point. I have grave concerns about Chris' mental-health, and I believe he needs to seek

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professional help because I am worried he will do something to hurt himself or someone else if he doesn't get the help he needs. As such, I believe Chris should also be prevented from possessing a firearm because he is a danger to himself and others.

I declare under penalty of perjury under the laws of the United States and State of Washington that the foregoing is true and correct.

Signed on April 14, 2020

Tiffany Ko

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